

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

_____	)	
UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 4:11-cv-00077-RWS
AMEREN MISSOURI,	)	
	)	
Defendant.	)	
_____	)	

**UNITED STATES' BRIEF IN SUPPORT OF ITS  
MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

**Exhibit A**

No.	Control Number	Date Created	Date Sent	Custodian	Page Count	File Name	File Extension	Subject	To	From	CC	Privilege Bases Asserted	Document Description and Reason for Privilege Bases Asserted
195	AMPR1000403135	5/5/2005 0:00		WhitworthSteve	0	EA36mbyUnitUECoal.xls	xls					Attorney Client; Work Product	Draft document prepared at request of counsel and shared with counsel for use and reference and to facilitate the provision of legal advice regarding pending matters
196	AMPR1000403137	5/5/2005 0:00		WhitworthSteve	0	EA36mbyUnitRI.xls	xls					Attorney Client; Work Product	Draft document prepared at request of counsel and shared with counsel for use and reference and to facilitate the provision of legal advice regarding pending matters
202	AMPR1000403152	8/5/2010 0:00		WhitworthSteve	0	Rush Island 2 Spring 2010 Emission Analysi.xls	xls					Attorney Client; Work Product	Draft document prepared at request of counsel and shared with counsel for use and reference, and to facilitate the provision of legal advice regarding pending matters
273	1000001179	1/15/2009 0:00		Leingang, William	2	Rush 2 Boiler Contract Meeting Notes 1 15 2009.doc	doc					Attorney Client; Work Product	Document summarizing agenda and discussions from meeting which included counsel containing/reflecting legal advice of counsel regarding contractual relationship
274	1000022095	8/13/2010 0:00		HutchesonMichael		2009_2010 RUSH UNIT 2.xls	xls					Attorney Client; Work Product	Workpapers/background materials organized for and supporting document prepared at request of counsel containing/reflecting legal advice and prepared to facilitate provision of legal advice in existing litigation
275	1000022106	1/6/2011 0:00		HutchesonMichael		Rush 2 Hourly Highs Evaluated.xls	xls					Attorney Client; Work Product	Draft workpapers/analysis prepared to assist in preparation of and support document prepared at request of counsel containing/reflecting legal advice and prepared to facilitate provision of legal advice in existing litigation

276	1000022107	1/6/2011 0:00		HutchesonMichael		Rush 2 Hourly Highs.xls	xls					Attorney Client; Work Product	Draft workpapers/analysis prepared to assist in preparation of and support document prepared at request of counsel containing/reflecting legal advice and prepared to facilitate provision of legal advice in existing litigation
277	1000022119	5/5/2005 0:00		HutchesonMichael		EA36mbyUnitRI.xls	xls					Attorney Client; Work Product	Information prepared at request of counsel to assist in legal analysis and in preparation of and support of document prepared at request of counsel to facilitate provision of legal advice in existing litigation
278	1000022121	5/5/2005 0:00		HutchesonMichael		EA36mbyUnitUECoal.xls	xls					Attorney Client; Work Product	Information prepared at request of counsel to assist in legal analysis and in preparation of and support of document prepared at request of counsel to facilitate provision of legal advice in existing litigation
280	1000022128	12/4/2009 0:00		HutchesonMichael		summary table.xls	xls					Attorney Client; Work Product	Document prepared at request of counsel to facilitate provision of legal advice in existing litigation and reflecting/containing legal advice
441	AMPR1000402737	11/10/2009 0:00		Ken Anderson		MO NSR Project Outages.xls	xls					Attorney Client; Work Product	Document reflecting legal advice and analysis regarding environmental regulatory issues related to pending litigation
464	AMPR1000402905	12/9/2008 0:00		Daniel Schaeffer		Rush Island Engr Projects.xls	xls					Attorney Client; Work Product	Document containing information and analyses prepared for and at request of counsel
500	AMPR1000404010	2/3/2010 0:00		MeinersBob	30	Project Review Board Presentation - Rush Island FGD - Final.pdf	pdf					Attorney Client; Work Product	Document prepared at request of counsel and shared with counsel for use and reference and to facilitate the provision of legal advice regarding existing matters

616	1000021912	6/9/2010 0:00		HutchesonMichael		NSPS Modification Analysis.xls	xls					Work Product	Document prepared at request of counsel containing/reflecting legal advice and prepared to facilitate provision of legal advice in existing matter
617	1000021913	4/21/2010 0:00		HutchesonMichael	136	Supplemental Data Binder 04-22.pdf	pdf					Work Product	Draft document prepared at request of counsel for purpose of legal analysis and rendering legal advice in existing matter
618	1000021934	12/30/2009 0:00		HutchesonMichael		Rush Island Unit 1 Hourly Data Analysis.xls	xls					Work Product	Document prepared at request of counsel for purpose of rendering legal advice in existing matter
619	1000021935	12/30/2009 0:00		HutchesonMichael		Rush Island Unit 2 Hourly Data Analysis.xls	xls					Work Product	Document prepared at request of counsel for purpose of rendering legal advice in existing matter
620	1000022113	2/4/2011 0:00		HutchesonMichael		Rush 2 Post April 13.xls	xls					Attorney Client	Document prepared at request of counsel containing/reflecting legal advice and prepared to facilitate provision of legal advice in existing matter
621	1000152057	6/27/2011 0:00		General		Reasonable Possibility Post Project Record.xlsx	xlsx					Attorney Client	Document prepared at request of counsel to facilitate provision of legal advice and containing/reflecting legal analysis and legal advice of counsel regarding
645	1000286279	1/6/2011 0:00		HughesSteve		Rush 2 Hourly Highs (2).xls	xls					Attorney Client; Work Product	Document containing information and analyses prepared for and at request of counsel
647	1000286818	1/6/2011 0:00		HughesSteve		Rush 2 Hourly Highs Evaluated.xls	xls					Attorney Client; Work Product	Document containing information and analyses prepared for and at request of counsel
664	ADRE1000347159	1/29/2010 0:00		EnvironmentalDept		rush 2 outage.xls	xls					Attorney Client; Work Product	Draft analysis prepared at counsel's request to facilitate provision of legal advice regarding environmental and regulatory issues
667	ADRE1000348824	11/26/2003 0:00		MenneMike	3	NSR Letter.doc	doc					Attorney Client; Work Product	Draft correspondence containing/reflecting work product and legal advice of counsel